

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

PROMEGA CORPORATION,

Plaintiff,

MAX-PLANCK-GESELLSCHAFT ZUR
FORDERUNG DER WISSENSCHAFTEN
E.V.,

Case No.: 10-CV-281

Involuntary Plaintiff,

v.

LIFE TECHNOLOGIES CORPORATION,
INVITROGEN IP HOLDINGS, INC., and
APPLIED BIOSYSTEMS, INC.,

Defendants.

**Unopposed Motion for Extension of Pretrial Dates Related to Illness and Anticipated Death
of Promega's Lead Counsel's Father**

Now Comes James R. Troupis of Troupis Law Office LLC, Promega's counsel, and respectfully moves that certain Pretrial Dates be extended by 14 days in consideration of the illness and anticipated death of his father, and in support of said Motion states as follows:

- 1.) This past week, James Troupis' father, Christ Troupis, suffered a serious setback and is now in the hospital. He is given no more than 2 weeks to live.
- 2.) James Troupis is lead counsel for Promega Corporation. Two other members of the trial team, Sarah Troupis and Stewart Karge, are the granddaughter and son-in-law, respectively, of Christ Troupis.
- 3.) James Troupis will be unable to participate in any way in the pretrial filings and preparations during this two week period from December 19-January 2, as his father passes-away and the

funeral is held in Illinois. He is presently with his father, mother and other members of his family. So too, Sarah Troupis and Stewart Karge, will be unable to participate during substantial parts of that same time period as a result of their family responsibilities.

4.) The trial in this matter is set for February 6, so that postponement by two weeks of the Pretrial filings and final pretrial conference (i.e. Motions in Limine, jury instructions etc. set for December 30; Responses due January 6, and final pretrial conference set for January 12/Reset to January 13, 20 and 24 (or anytime the week of January 30-February 3)) will not affect the trial date.

5.) Counsel for the Defendants has indicated they do not object to this request.

WHEREFORE, Plaintiff, Promega Corporation, respectfully requests that this the Pretrial dates for submissions be postponed by 14 or more days and that the Court set such time as it may have for the final pretrial conference consistent with that extension of dates.

Dated this 19th day of December, 2011.

By: /s/ James R. Troupis
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